

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

LENAISE MEYEIL WILLIAMS, §
Plaintiff, § Civil Action No. 4:14-cv-1909
v. §
DERRIL PATRICK VALLERY SR. §
Defendant. §
§

DEFENDANT’S ORIGINAL ANSWER AND AFFIRMATIVE DEFENSES

Derril Patrick Vallery Sr. (hereinafter referred to as “Vallery”), by way of answer to Plaintiff Lenaïse Meyeil Williams’ (Williams) Original Complaint (the “Complaint”) says:

Parties

1. Defendant Vallery lacks knowledge or information sufficient to form a belief about the truth of the allegations in the first sentence in § 1 of the Complaint.
2. Defendant Vallery admits allegations of § 2 of the complaint.

Jurisdiction and Venue

1 3. The allegations of § 3 of the Complaint set forth a legal conclusion for which no
2 response is required. If a response is required, upon information and belief, Defendant Vallery
3 admits the allegations of § 3 of the Complaint

4 4. The allegations of § 4 of the Complaint set forth a legal conclusion for which no
5 response is required. If a response is required, upon information and belief, Defendant Vallery
6 admits the allegations of § 4 of the Complaint

7 5. The allegations of § 5 of the Complaint set forth a legal conclusion for which no
8 response is required. If a response is required, upon information and belief, Defendant Vallery
9 admits the allegations of § 5 of the Complaint

10 **STATEMENT OF FACTS**

11 6. Defendant generally denies §6-§70

12 **AFFIRMATIVE DEFENSES**

13 7. Plaintiff's claims are barred by the affirmative defense of release under Rule 8(c)1
14 of the Federal Rules of Civil Procedure

ATTORNEYS FEES AND COSTS

8. It has become necessary for Defendant to retain the services of Christopher Augustine Gabel, Attorney at Law, to represent him in defense against Plaintiff's claims. Defendant is entitled to payment of his reasonable attorney's fees from Plaintiff.

9. Date: August 5, 2014

/s/ Christopher Augustine Gabel

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